

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

EPIC SYSTEMS CORPORATION
a Wisconsin Corporation,

Plaintiff and Counterclaim Defendant,

v.

Case No. 14-CV-748

TATA CONSULTANCY SERVICES
LIMITED, an Indian Corporation; and
TATA AMERICA INTERNATIONAL
CORPORATION (dba TCS AMERICA),
a New York Corporation,

Defendants and Counterclaim Plaintiffs.

DECLARATION OF MEME HILLEY

I, Meme Hilley, hereby declare as follows under penalty of perjury and pursuant to 28 U.S.C. § 1746:

1. I am a paralegal with Quarles & Brady LLP, attorneys for Plaintiff Epic Systems Corporation, and as such have personal knowledge of the facts stated below.

2. I submit this declaration in support of Plaintiff's Motion to Dismiss Defendants' Counterclaims.

3. Attached as Exhibit 1 is a true and correct copy of the Notice of Deposition of Anubhav Gupta, dated December 11, 2015.

4. Attached as Exhibit 2 is a true and correct copy of the Notice of Deposition of Anuj Kalra, dated December 11, 2015.

5. Attached as Exhibit 3 is a true and correct copy of the Notice of Deposition of Arun Karuppaiah, dated December 11, 2015.

6. Attached as Exhibit 4 is a true and correct copy of the Notice of Deposition of Ayush Sharma, dated December 11, 2015.

7. Attached as Exhibit 5 is a true and correct copy of the Notice of Deposition of Chandrasekhar Mothali, dated December 11, 2015.

8. Attached as Exhibit 6 is a true and correct copy of the Notice of Deposition of Deepak Jindal, dated December 11, 2015.

9. Attached as Exhibit 7 is a true and correct copy of the Notice of Deposition of Dipen Thakkar, dated December 11, 2015.

10. Attached as Exhibit 8 is a true and correct copy of the Notice of Deposition of Eldhose Rajan, dated December 11, 2015.

11. Attached as Exhibit 9 is a true and correct copy of the Notice of Deposition of Eric Helsher, dated December 11, 2015.

12. Attached as Exhibit 10 is a true and correct copy of the Notice of Deposition of Gaurav Singh, dated December 11, 2015.

13. Attached as Exhibit 11 is a true and correct copy of the Notice of Deposition of Judith Faulkner, dated December 11, 2015.

14. Attached as Exhibit 12 is a true and correct copy of the Notice of Deposition of Kalyan Dhanireddy, dated December 11, 2015.

15. Attached as Exhibit 13 is a true and correct copy of the Notice of Deposition of Karun Biyani, dated December 11, 2015.

16. Attached as Exhibit 14 is a true and correct copy of the Notice of Deposition of Manish Kumar, dated December 11, 2015.

17. Attached as Exhibit 15 is a true and correct copy of the Notice of Deposition of Mohan Kantrapati, dated December 11, 2015.

18. Attached as Exhibit 16 is a true and correct copy of the Notice of Deposition of Naveen Venkatesh, dated December 11, 2015.

19. Attached as Exhibit 17 is a true and correct copy of the Notice of Deposition of Perveen Kumar, dated December 11, 2015.

20. Attached as Exhibit 18 is a true and correct copy of the Notice of Deposition of Peter Devault, dated December 11, 2015.

21. Attached as Exhibit 19 is a true and correct copy of the Notice of Deposition of Romika Singh, dated December 11, 2015.

22. Attached as Exhibit 20 is a true and correct copy of the Notice of Deposition of Shankar Manickam, dated December 11, 2015.

23. Attached as Exhibit 21 is a true and correct copy of the Notice of Deposition of Sohadra Upadhyay, dated December 11, 2015.

24. Attached as Exhibit 22 is a true and correct copy of the Notice of Deposition of Sravan Parnandi, dated December 11, 2015.

25. Attached as Exhibit 23 is a true and correct copy of the Notice of Deposition of Sumit Rana, dated December 11, 2015.

26. Attached as Exhibit 24 is a true and correct copy of the Notice of Deposition of Suresh Thippireddy, dated December 11, 2015.

27. Attached as Exhibit 25 is a true and correct copy of the Notice of Deposition of Vamsi Vasireddy, dated December 11, 2015.

28. Attached as Exhibit 26 is a true and correct copy of the Notice of Deposition of Yogi Sanghi, dated December 11, 2015.

29. Attached as Exhibit 27 is a true and correct copy of Defendants' Fifth Set of Document Requests to Plaintiff Epic Systems Corporation, dated December 11, 2015.

30. Attached as Exhibit 28 is a true and correct copy of a December 18, 2015 e-mail from Philip Robben to Rick Richmond.

31. Attached as Exhibit 29 is a true and correct copy of an August 2015 Performance Report entitled "Acute EMR Market Share: How Did My Vendor Fare in 2014."

Dated this 23rd day of December, 2015.

/s/ Meme Hilley

Meme Hilley

Dated: December 23, 2015

/s/ Anthony A. Tomaselli

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Attorneys for Plaintiff Epic Systems Corporation

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2015, I electronically filed the foregoing with the Clerk of Court using the Court's CM/ECF system, which will send notification of such filing to all counsel of record.

Dated: December 23, 2015

/s/ Anthony A. Tomaselli